

App. No. 09/876,361
Amendment Dated: November 9, 2006
Reply to Office Action of August 10, 2006

RECEIVED
CENTRAL FAX CENTER

NOV 09 2006

REMARKS/ARGUMENTS

Claims 1-23 remain in this application for further review. No new matter has been added.

I. Rejections of Claims 1-23 under 35 U.S.C. §103(a)

Claims 1-23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,526,426 to Lakritz (hereinafter "Lakritz") in view of U.S. Patent No. 6,466,900 to Lissauer, et al. (hereinafter "Lissauer"). Applicants respectfully disagree with the rejection. Independent claim 1 has been amended to include the following combination of features that are not taught or otherwise suggested by the cited references:

receiving edits on a client device for a pre-translated document, wherein the edits include at least one member of a group comprising the addition of text, formatting, and a non-text entry to the pre-translated document;

receiving a request on the client device to translate the pre-translated document from a first language to a second language(emphasis added);

Applicants assert that neither Lakritz nor Lissauer teach or otherwise suggest the features of independent claim 1. Lakritz teaches enhancing "an existing Web site by adding advanced multilingual content management and process control capabilities *to the customer's Web server.*" Lakritz, at Col.3 Lines 32-34. Lakritz further teaches *allowing visitors* to a website enter "information and feedback into a fill-out form in their local language to send back to the Web site manager....The Developer module captures and tags all such information in a sufficient manner so it can be *subsequently translated and analyzed by the customer.*" Lakritz, at Col.7 Lines 13-20. Succinctly, stated, Lakritz teaches receiving text edits and entries from a visitor, on a visitor device, and translation requests from a Web site manager, on a client device. That is, the edits and the request to translate come from different devices. As such, Lakritz cannot possible teach "receiving

App. No. 09/876,361
Amendment Dated: November 9, 2006
Reply to Office Action of August 10, 2006

edits on a client device for a pre-translated document” and also “receiving a request on the client device to translate the pre-translated document.”

Independent claim 10 has been amended to include the following combination of features that are not taught or otherwise suggested by the cited references:

receiving edits from a user for a *pre-translated non-HTML document*, wherein the edits include at least one member of a group comprising the addition of text, formatting, and a non-text entry to the pre-translated document;

receiving a request to translate the pre-translated document from a first language to a second language;

receiving a list of translation services for translating a document from a first language to a second language;

receiving a selection of a translation service from the list of translation services; requesting an identification for the selected translation service;

saving the pre-translated document, including the text entry, the non-text entry, and the formatting to a temporary storage medium;

saving the pre-translated document as an HTML document, including saving a path from the HTML document to the non-text entry saved in the temporary storage medium, instead of saving the non-text entry in the HTML document;

sending the HTML document to the selected translation service via the identification for the selected translation service;

App. No. 09/876,361
Amendment Dated: November 9, 2006
Reply to Office Action of August 10, 2006

receiving a translated HTML document from the selected translation service; and

displaying the translated HTML document.

Applicants assert that neither Lakritz nor Lissauer teach or otherwise suggest the features of independent claim 10. Lakritz teaches receiving input text that is submitted using a form on a website. *Lakritz*, at Col. 4, Lines 57-60. The input text is converted to an internal format. Id. The internal format document is then converted to the appropriate format required by a Translation Resource. *Lakritz*, at Col. 9, Lines 64-67. When the document has been translated by the Translation Resource it is converted back into the internal format. *Lakritz*, at Col.10, Lines 7-11. Finally, "the internal format document is converted back to the document's original format (e.g., HTML)." *Lakritz*, at Col.10, Lines 15-20. Thus, a document is only converted to HTML *after it has been translated*. As such, Lakritz cannot possible teach "receiving edits from a user for a pre-translated non-HTML document," "saving the pre-translated document as an HTML document," and "sending the HTML document to the selected translation service." Further, Lakritz only teaches converting a document to HTML *when the documents original format is also HTML*. *Lakritz*, at Col.10, Lines 15-20. As such, Lakritz cannot possible teach "receiving edits from a user for a pre-translated non-HTML document" and also "saving the pre-translated document as an HTML document."

Independent claim 12 has been amended to include the following combination of features that are not taught or otherwise suggested by the cited references:

saving a pre-translated non-HTML document including non-text entries and formatting *as an HTML formatted document*, the HTML formatted document including tags for the formatting of the pre-translated document and tags linking the HTML formatted document to the non-text entries in the pre-translated document, instead of the HTML formatted document including the non-text entries;

App. No. 09/876,361
Amendment Dated: November 9, 2006
Reply to Office Action of August 10, 2006

Applicants assert that neither Lakritz nor Lissauer teach or otherwise suggest the features of independent claim 10. Lakritz teaches receiving input text that is submitted using a form on a website. *Lakritz*, at Col. 4, Lines 57-60. The input text is converted to an internal format. Id. The internal format document is then converted to the appropriate format required by a Translation Resource. *Lakritz*, at Col. 9, Lines 64-67. When the document has been translated by the Translation Resource it is converted back into the internal format. *Lakritz*, at Col.10, Lines 7-11. Finally, "the internal format document is converted back to the document's original format (e.g., HTML)." *Lakritz*, at Col.10, Lines 15-20. Thus, a document is only converted to HTML *after it has been translated*. As such, Lakritz cannot possible teach "saving a pre-translated non-HTML document including non-text entries and formatting as an HTML formatted document." Further, Lakritz only teaches converting a document to HTML *when the documents original format is also HTML*. *Lakritz*, at Col. 10, Lines 15-20. As such, Lakritz cannot possible teach "saving a pre-translated non-HTML document including non-text entries and formatting as an HTML formatted document."

Independent claim 14 has been amended to include the following combination of features that are not taught or otherwise suggested by the cited references:

a word processing module operative,

to request from a redirection server a URL of a translation server;

to receive from the redirection server the URL;

to save as HTML an original non-HTML document requiring translation from a first language to a second language, such that non-text entries and formatting of the original document are saved to a temporary storage medium, and such that the saved document includes paths to the non-text entries and formatting of the original document saved to the temporary storage medium, instead of the saved document including the non-text entries of the original document;

App. No. 09/876,361
Amendment Dated: November 9, 2006
Reply to Office Action of August 10, 2006

Applicants assert that neither Lakritz nor Lissauer teach or otherwise suggest the features of independent claim 10. Lakritz teaches receiving input text that is submitted using a form on a website. *Lakritz*, at Col. 4, Lines 57-60. The input text is converted to an internal format. *Id.* The internal format document is then converted to the appropriate format required by a Translation Resource. *Lakritz*, at Col. 9, Lines 64-67. When the document has been translated by the Translation Resource it is converted back into the internal format. *Lakritz*, at Col.10, Lines 7-11. Finally, "the internal format document is converted back to the document's original format (e.g., HTML)." *Lakritz*, at Col.10, Lines 15-20. Thus, a document is only converted to HTML *after it has been translated*. As such, Lakritz cannot possible teach "a word processing module operative...to save as HTML an original non-HTML document requiring translation." Further, Lakritz only teaches converting a document to HTML *when the documents original format is also HTML*. *Lakritz*, at Col.10, Lines, 15-20. As such, Lakritz cannot possible teach "a word processing module operative...to save as HTML an original non-HTML document requiring translation."

Independent claim 17 has been amended to include the following combination of features that are not taught or otherwise suggested by the cited references:

receiving on a client device edits to a pre-translated document, wherein the edits include at least one member of a group comprising the addition of text, formatting, and non-text entries to the pre-translated document;

receiving a request on the client device to translate the pre-translated document from a first language to a second language;

Applicants assert that neither Lakritz nor Lissauer teach or otherwise suggest the features of independent claim 17. Lakritz teaches enhancing "an existing Web site by adding advanced multilingual content management and process control capabilities *to the customer's Web server*." *Lakritz*, at C.3 lines 32-34. Lakritz further teaches *allowing visitors* to a website enter "information and feedback into a fill-out form in their local

App. No. 09/876,361
Amendment Dated: November 9, 2006
Reply to Office Action of August 10, 2006

RECEIVED
CENTRAL FAX CENTER

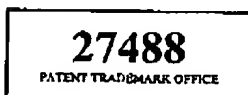
NOV 09 2006

language to send back to the Web site manager....The Developer module captures and tags all such information in a sufficient manner *so it can be subsequently translated and analyzed by the customer.*" Lakritz, at C.7 lines 13-20. Succinctly, stated, Lakritz teaches receiving text edits and entries from a visitor, on a visitor device, and translation requests from the Web site manager, on a client device. That is, the edits and the request to translate come from different devices. As such, Lakritz cannot possible teach "receiving on a client device edits to a pre-translated document" and also "receiving a request on the client device to translate the pre-translated document."

Claims 2-9, 11, 13, 15, 16, and 18-23 include features that are not taught or otherwise suggested by the cited references. Moreover, those claims ultimately depend from independent claims 1, 10, 12, 14, and 17, respectively. As such, applicants assert that they should be found allowable for at least the same reasons as their respective independent claims.

II. Request for Reconsideration

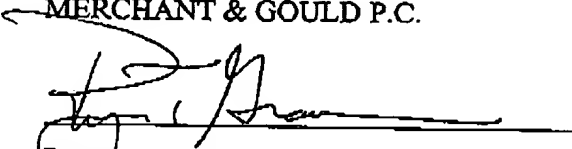
In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.



MERCHANT & GOULD P.C.
P. O. Box 2903
Minneapolis, Minnesota 55402-0903
206.342.6200

Respectfully submitted,

MERCHANT & GOULD P.C.



Ryan T. Grace

Registration No. 52,956

Direct Dial: 206.342.6258